

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KATHERINE YOST,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Case No. 1:22-cv-06549(PAE)(SLC)
	:	
EVERYREALM INC., COMPOUND ASSET	:	
MANAGEMENT LLC, REALM METAVERSE	:	<u>DECLARATION OF</u>
REAL ESTATE INC., REPUBLIC, REPUBLIC	:	<u>LLOYD B. CHINN</u>
CRYPTO LLC, REPUBLIC REALM MANAGER	:	
LLC, REPUBLIC REALM INC., REPUBLIC	:	
OPERATIONS LLC, OPENDEAL INC.,	:	
OPENDEAL PORTAL LLC, JANINE YORIO in	:	
her individual and professional capacities,	:	
WILLIAM KERR in his individual and	:	
professional capacities, and ZACH HUNGATE in	:	
his individual and professional capacities.	:	
	:	
Defendants.	:	
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I, LLOYD B. CHINN, pursuant to 28 U.S.C. § 1746, affirm as follows:

1. I am a Partner with Proskauer Rose, LLP, attorneys for Defendants Everyrealm Inc. (f/k/a Republic Realm Inc.), Janine Yorrio, William Kerr, and Zach Hungate (collectively “the Everyrealm Defendants”). I am fully familiar with the facts and circumstances recited herein.
2. I submit this Declaration in support of the Everyrealm Defendants’ Motion to Dismiss Plaintiff’s Sexual Harassment Claim.
3. On August 4, 2022, Plaintiff Katherine Yost (“Yost”) filed a Charge of Discrimination with the Equal Employment Opportunity Commission naming Everyrealm Inc. as a Respondent.

4. A true and correct copy of Yost's Charge of Discrimination is attached hereto as Exhibit A.

5. On July 11, 2022, Counsel for Plaintiff transmitted a letter to William Kerr threatening litigation against Everyrealm Inc. and others, and detailing Plaintiff's purported claims.

6. Plaintiff's July 11 communication was provided to me by Everyrealm on July 13, 2022.

7. I responded to Plaintiff's July 11 communication via letter on July 22, 2022.

8. In response to the Everyrealm Defendants' Motion to Compel Arbitration, Plaintiff referenced this letter and wrote that she provided a "confidential letter to Defendants informing them of her well-founded allegations on her behalf."

9. A true and correct copy of the July 11, 2022 Letter is attached hereto as Exhibit B.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury the foregoing is true and correct.

Dated: November 2, 2022

/s/ Lloyd B. Chinn
Lloyd B. Chinn